UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLENDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, **CALIFORNIA** INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, UNIVERSITY, **TRUSTEES** CORNELL DARTMOUTH COLLEGE, DUKE UNIVERSITY, **EMORY** UNIVERSITY, **GEORGETOWN** UNIVERSITY, THE **JOHNS HOPKINS** UNIVERSITY, MASSACHUSETTS INSTITUTE TECHNOLOGY, **NORTHWESTERN** UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

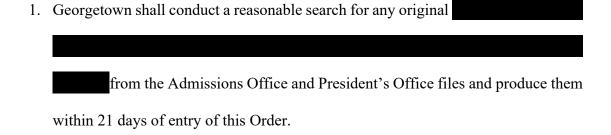
Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

[PROPOSED] ORDER REGARDING PLAINTIFFS' MOTION TO COMPEL AND FOR SANCTIONS AGAINST GEORGETOWN UNIVERSITY AND ITS COUNSEL AND FOR RELATED RELIEF

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Pending before the Court is Plaintiffs' Motion To Compel And For Sanctions Against Georgetown University And Its Counsel And For Related Relief (ECF 412). Upon consideration of the said Motion and the Joint Status Report submitted by Plaintiffs and Georgetown on July 31, 2023, to resolve Plaintiffs' Motion to Compel and for Sanctions filed on July 31, 2023, the Court enters the following Order:



- 2. Georgetown shall conduct a reasonable search from the President's Office files, on a "go get' basis, for documents that describe the reasons a particular individual may be on the ______," and shall produce those documents within 28 days of entry of this Order. If Georgetown does not believe it can meet that deadline, it shall file a motion to extend this deadline within 21 days of entry of this Order.
- 3. Georgetown shall conduct a reasonable search on a "go-get" basis from the Advancement Office files for documents that describe the reasons a particular individual may have been _________, and shall produce those documents within 28 days of entry of this Order. If Georgetown does not believe it can meet that deadline, it shall file a motion to extend this deadline within 21 days of entry of this Order.
- 4. Georgetown shall insert unique identifying numbers ("UIDs") over the applicant names in the documents identified pursuant to the above searches, regardless of

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whether or not the document qualifies as a "donation record" under the Agreed

Confidentiality Order (ECF No. 254), or an amendment thereto, to the extent such

UIDs are included in Georgetown's structured data. Georgetown may otherwise

redact any documents pursuant to FERPA and the Agreed Confidentiality Order (or

any amendment thereto).

5. After the production of the above information, the parties shall meet and confer at

Plaintiffs' request in good faith to determine whether additional searches are

appropriate, including targeted searches for information related to particular

candidates identified in the above referenced productions.

6. The parties shall continue to meet and confer regarding a process that would allow

Plaintiffs to question Georgetown witnesses about the names of particular

candidates, but whose names in any particular documents are redacted under

FERPA and the Agreed Confidentiality Order, or any amendment thereto. If the

parties cannot come to an agreed upon process, they shall submit the dispute to the

Court via joint status report due on August 15, 2023.

SO ORDERED:

Dated:						
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Hon. Matthew F. Kennelly

United States District Judge

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